

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CAROL MARTUCCI,

Plaintiff,

- against -

HARTFORD LIFE INSURANCE
COMPANY,

Defendant.

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10 CV 6231 (BSJ)(RLE)

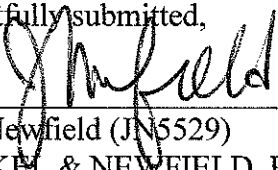
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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed declaration of Jason Newfield, Esq., Plaintiff, Carol Martucci, will move this Court before the Honorable Ronald Ellis, at the United States Courthouse, for the Southern District of New York for an Order, extending the discovery cut off date by thirty (30) days, and for such other and further relief as this Court deems just and proper.

Dated: Garden City, New York
April 20, 2011

Respectfully submitted,



Jason Newfield (JN5529)
FRANKEL & NEWFIELD, P.C.
585 Stewart Avenue, Suite 312
Garden City, New York 11530

TO: Michael Bernstein, Esq.
Sedgwick, Detert, Moran & Arnold, LLP
125 Broad Street
New York, New York 10004-0925

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CAROL MARTUCCI,	:
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Plaintiff,	:
	:
- vs. -	:
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HARTFORD LIFE INS. CO.	:
	:
Defendants.	:
-----X	

10 CV 6231 (BSJ)(RLE)

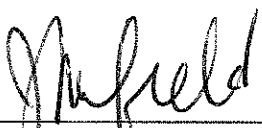
**DECLARATION OF
JASON NEWFIELD**

Pursuant to 28 U.S.C. § 1746, Jason Newfield states as follows:

1. I am a Partner with Frankel & Newfield, P.C. and I am counsel of record for the Plaintiff, Carol Martucci, in this matter.
2. This declaration is respectfully submitted in support of Plaintiff's application for an extension of the end date for discovery, currently set for April 21, 2011, to be extended for thirty (30) days.
3. Counsel for Defendant has consented to this request for a thirty (30) day extension.
4. Defendant has provided its initial responses to discovery, and has provided Plaintiff with a Stipulated Protective Order, which is being submitted to the Court.
5. However, Defendant has not yet produced documents which will be produced, pending the Court's approval of the Stipulated Protective Order.
6. In addition, there may be discovery disputes to bring before the Court.
7. Accordingly, good cause exists to extend the discovery cut off date by an additional thirty (30) days.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 20, 2011
Garden City, New York



Jason Newfield (JN5529)